UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

In re	)	
LAUREN F.A. PRICE,	)	
Debtor	)	Case No. 17-20240-jpk
	)	Chapter 13
	)	
	)	

OBJECTION TO DEBTOR'S CHAPTER 13 PLAN

Comes now, Steve Bom, counsel for defendant creditor, La Porte Community Federal Credit Union, and Objects to the debtor's Chapter 13 plan, and in support of said motion says:

1. That La Porte Community Federal Credit Union is the only secured creditor of the debtor.

2. That debtor has no history of regular gainful employment.

3. That debtor has no equity in the collateral.

4. That debtor has a suspended driver's license, and an outstanding warrant for her arrest, for driving while suspended in Marion County, Indiana, which subjects the collateral to impoundment and additional loss to the value of the collateral.

5. That debtor has been arrested numerous times for Driving While Suspended, which subjects the collateral to impoundment and additional loss of value of the collateral.

6. That debtor has secreted the collateral for a year, and the creditor has no reason to believe that she will make payments according to her plan because there are no real consequences if she doesn't once the collateral is returned to her.

7. That debtor has falsified numerous documents in furtherance of her scheme to keep the vehicle without paying for it.

8. That debtor has fraudulently alleged residence in Lake County for the last 6 months when in fact, she has been living in Marion County Indiana since August 2016, and has applied for government assistance there.

Wherefore La Porte Community Federal Credit Union objects to confirmation of the debtor's plan, and for such other relief appropriate in the premises.

Steve Bom #3975-46
Attorney for Defendant
628 Boston St.
La Porte, IN 46350
219-575-1420
juncyrdjd@Yahoo.com